



NEW YORK
REGIONAL OFFICE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
100 PEARL STREET, SUITE 20-100
NEW YORK, NY 10004-2616

August 28, 2024

VIA ECF

The Honorable Judge Jesse M. Furman
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: SEC v. Mmobuosi, et al., No. 23 Civ. 10928 (JMF)

Dear Judge Furman:

Plaintiff Securities and Exchange Commission (“SEC”) respectfully submits this letter to notify the Court of correspondence received today, August 28, 2024, from John M. Scott, Chairman of the Board of Directors and the new Interim Chief Executive Officer for corporate defendant Tingo Group, Inc. (“Tingo Group”). Mr. Scott requested that the SEC bring the enclosed letter to the Court’s attention for consideration in connection with the SEC’s pending motion for default judgment (the “Motion”). (Dkt. 67). The letter confirms that Tingo Group is in default and will not be appearing through counsel in this action, and the SEC stands by the arguments made in support of the Motion and the relief requested therein. As none of the defendants have entered an appearance or filed an opposition to the Motion by their August 16 deadline, the SEC respectfully requests that the Court enter the SEC’s Proposed Default Judgment (Dkt. 71) against all defendants as unopposed.

Respectfully submitted,

/s/ Michael S. DiBattista
Michael S. DiBattista
Counsel to SEC

Encl.